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17 *Cayman Islands Corporation*

18
19 **UNITED STATES DISTRICT COURT**
20 **NORTHERN DISTRICT OF CALIFORNIA**
21 **SAN JOSE DIVISION**

22 ARIEL ABITTAN,
23 Plaintiff,
24 v.
25 LILY CHAO, et. al.
26 Defendants,
27 and
28 EIAN LABS INC.,
NOMINAL DEFENDANT.

Case No. 20-CV-09340-NC
Filed: December 24, 2020

**JOINT STATUS UPDATE
REGARDING INITIAL
DISCLOSURES**

Judge: Hon. Nathanael Cousins

29 YUTING CHEN,
30 Plaintiff,
31 v.
32 ARIEL ABITTAN, et. al.,
33 Defendants.

Case No. 21-CV-09393-NC
Filed: December 3, 2021

1 Pursuant to this Court's April 12, 2023 Order [ECF No. 182] in Case No. 5:20-CV-09340
 2 (the "Abittan Case") and [ECF No. 82] in Case No. 5:21-CV-09393 (the "Chen Case"), Plaintiff
 3 Ariel Abittan ("Abittan") and Defendants Lily Chao, Damien Ding, and Temujin Labs Inc. (the
 4 "Abittan Case Defendants"), and Plaintiff Yuting Chen ("Chen") and Defendants Abraham Abittan,
 5 Rachel Abittan, Brian Abittan, Jacob Abittan, Alyssa Abittan, Eliana Abittan, Roy Gruber, Tova
 6 Gruber, and Realtime NY LLC (together with Abittan, the "Chen Case Defendants")¹ submit this
 7 joint status update regarding initial disclosures with a proposed agenda for the hearing set for April
 8 26, 2023.

9 The parties have not resolved their dispute regarding initial disclosures. Per the Court's
 10 request, the parties intend to address their positions at tomorrow's hearing.

11 The parties propose the following agenda:

12 1. Chen Case:

- 13 a. Damages deficiencies
- 14 b. Personal residences of Yuting Chen and Damien Ding
- 15 c. Location of documents

16 2. Abittan Case:

- 17 a. Location of documents
- 18 b. Declaration of Damien Ding

19 3. Additional discovery topics:

- 20 a. Yuting Chen's improper use of "Attorney's Eyes Only" designation on
 documents
- 21 b. Abittan's request for additional deposition time, over 7 hours, based on Yuting
 Chen's request and need for a translator.

24 Respectfully submitted,

25 **FREEDMAN NORMAND FRIEDLAND LLP**

26 /s/ Brianna K. Pierce

27 Brianna K. Pierce

SAC ATTORNEYS LLP

/s/ James Giacchetti

James Giacchetti

28 ¹ The Chen Case Defendants, other than Ariel Abittan, do not consent to personal jurisdiction or
 waive any challenges to personal jurisdiction by filing this joint discovery letter.

1 *Attorneys for Abittan and the*
2 *Chen Case Defendants*

1 *Attorneys for Chen and the Abittan*
2 *Case Defendants*

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